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December 12, 2023

VIA ECF

Honorable Kenneth M. Karas U.S. District Court Judge The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas Street White Plains, NY 10601

Re: United States v. Laquan Falls, 22-cr-446 (KMK)

Dear Judge Karas:

I represent the above defendant. I write to seek permission to file a motion to dismiss, based on New York State Rifle & Pistol Ass'n, Inc. v. Bruen, 142 S. Ct. 2111 (2022), out of time.

The government has advised that it generally has no objection to a late motion but requests an extended period of time to oppose the motion, so that it is not due during the holidays. Falls has no objection to the government's request.

Accordingly, I respectfully request that the motion to dismiss filed by Falls today be accepted by the Court out of time. I also request that the government have until mid-January to oppose the motion and the defense have two weeks to file a reply, if any.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

Both requests are granted.

/s Francis L. O'Reilly

Francis Lee O'Reilly

cc: All Parties (via ECF)